

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Love Renovations & Design, LLC		BK NO. 22-12011-MDC  CHAPTER 11
	Debtor	
Kiavi Funding, Inc. F/K/A LendingHome Funding Corporation	Movant	
v. Love Renovations & Design, LLC	Respondent	
and  Leona Mogavero, Esquire	Additional Respondent	

**STIPULATION**

AND NOW, it is hereby stipulated and agreed by and between the undersigned as follows:

1. Movant Kiavi Funding, Inc. F/K/A LendingHome Funding Corporation (hereinafter “Movant”) filed a Motion for Relief from the Automatic Stay regarding the property at 1533 S. 4<sup>th</sup> Street, Philadelphia, PA 19147 on October 31, 2022 (the “Motion”).
2. Love Renovations & Design LLC (hereinafter “Respondent”, and together with Movant, the “Parties”), filed a response to the Motion for Relief on November 15, 2022.
3. A hearing regarding the Motion for Relief was held before the Honorable Chief Bankruptcy Judge Magdeline D. Coleman on November 30, 2022.
4. The Honorable Chief Bankruptcy Judge Magdeline D. Coleman continued the hearing to January 4, 2023 as the Movant and Respondent (collectively known as the “Parties”) continued to try and settle this matter.
5. The January 4, 2023 Hearing was continued to February 15, 2023, as the Parties continued to work towards a settlement.

6. The Parties have come to an agreement to resolve the Motion in accordance with the terms of this Stipulation.
7. Movant has agreed to satisfy the debt in question for \$351,621.79 as long as the funds are received on or before March 15, 2023.
8. In exchange for the above agreement, Respondent has agreed that if the \$351,621.79 is not received on or before March 15, 2023, then the Motion is automatically granted and Movant will be able to proceed with its Foreclosure Action filed in the Court of Common Pleas of Philadelphia County at Case No. 210501425.
9. The Parties agree if such funds are not received by Movant by March 15, 2023, then Bankruptcy Rule 4001(a)(3) will be waived.
10. This Stipulation effects a settlement of claims that are disputed.
11. This Stipulation is a compromise of a dispute resulting from arms-length negotiations conducted by the Parties, with the Parties' full approval and consent and is entered into for the purpose of avoiding the expense and/or burden of additional litigation.
12. If the case is converted to a Chapter 7, the Movant may file a Certification of Default with the court and the court shall enter an Order granting the Motion.

Date: February 2, 2023

/s/ Robert Wendt, Esquire  
By: Robert Wendt, Esquire  
Attorney for Movant

/s/ Jeffrey S. Cianiulli, Esquire  
Jeffrey S. Cianiulli, Esquire  
Attorney for Respondent

/s/ Leona Mogavero, Esquire  
Leona Mogavero, Esquire  
Chapter 11 Trustee

Approved by the Court this \_\_\_\_\_ day of \_\_\_\_\_, 2023.

BY THE COURT:

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Magdeline D. Coleman  
Chief U.S. Bankruptcy Judge